

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN**

In Re:

Chapter 13

**James Stephen Osieczonek
Karen Ruth Osieczonek**

Case No: 13-23443-mdm

Debtors.

**DEBTOR'S OBJECTION TO WELLS FARGO BANK, N.A.'S
MOTION FOR RELIEF FROM AUTOMATIC STAY**

James and Karen Osieczonek ("Debtors"), through their attorney, Angela M. Soltis, hereby respond to the Motion for Relief from Automatic Stay filed by Wells Fargo Bank, N.A., ("Creditor") for the property located at 1719 Center Road Waukesha, Wisconsin, 53189, in this bankruptcy case, and in support thereof, allege as follows:

1. Debtors fell behind on their mortgage payments when they were involved in a motorcycle accident that caused both Debtors to be off of work for several months.
2. Debtors are now back to work and able to make regular mortgage payments.
3. Debtors do have one (1) mortgage payment they are able to forward to creditor immediately.

WHEREFORE, Debtors request that the Motion for Relief from Stay be denied, or in the alternative, that a hearing be set on this matter.

Dated: December 16, 2014

/s/ Angela M. Soltis

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James Stephen Osieczonek **Case No: 13-23443-mdm**
Karen Ruth Osieczonek
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CERTIFICATION OF SERVICE

Angela M. Soltis, counsel for the Debtors, does hereby certify that a copy of the Objection to Wells Fargo Bank, N.A.'s Motion for Relief from Automatic Stay was electronically filed with the Court via the CM/ECF system, and duly served upon the following parties:

Mary B. Grossman
ecf@chapter13milwaukee.com

Office of the U. S. Trustee
ustpregion11.mi.ecf@usdoj.gov

Jay J. Pitner (Christopher Drout) on behalf of Creditor Wells Fargo Bank, N.A.,
bknotices@gray-law.com;bknotice@gmail.com

She further certifies that the following parties were served a copy via the United States Postal Service on this date:

James & Karen Osieczonek
1719 Center Road
Waukesha, WI 53189

Dated: December 16, 2014

/s/ Angela M. Soltis
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